

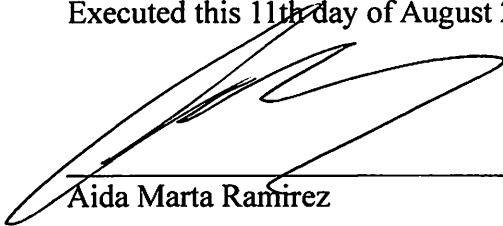
DECLARATION OF AIDA MARTA RAMIREZ

I, Aida Marta Ramirez, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.

1. I make this declaration based on my own personal knowledge and if called on to testify I could and would do so competently and truthfully to these matters.
2. I make this declaration to supplement my declaration filed on July 29 in this case. *See* ECF No. 29-5.
3. I learned on Saturday, July 14, 2025, that my client, G.M.S.G., was detained at Alligator Alcatraz. On July 16, 2025, I obtained the email address for requesting legal visits from outside sources, as the ICE website provided no contact information for scheduling visits. On July 16, 2025, I submitted a legal visit request with proposed dates and the official "Legal Visitation Request Form," which I also had to obtain from outside sources because it was not available on the ICE website. The request was acknowledged, but no dates were provided. On July 18, 2025, after the proposed dates expired, I sent another request with the updated form and new proposed dates. On July 20, 2025, the request was again acknowledged without a date. On July 23, 2025, after the second set of proposed dates expired, I sent a third request with updated dates and the proper form. Later that evening, near midnight, I received confirmation for a legal visit on July 25, 2025, at 10:00 a.m.
4. I was able to speak with G.M.S.G. during that July 25, 2025 videoconference; however, it appeared that he was in an open room wearing a headset, and I could not confirm whether the conversation was private or confidential. This single videoconference occurred weeks after my initial request and only after I had to make repeated follow-ups, which placed a significant burden on my time and resources and caused unnecessary delay in preparing his case. The limited access and uncertainty about confidentiality also impaired my ability to have a candid and thorough attorney–client discussion, which is critical for effective representation.
5. I still do not know what the official protocols are to schedule a legal call, legal videoconference, or in-person visit with a client detained at Alligator Alcatraz. I also do not know what the official protocols are to send legal mail to a client detained there. I am not aware of any publicly available information setting out any of these protocols
6. G.M.S.G. was detained on July 14, 2025. He was previously detained at Walton County Jail from his detention on July 1, 2025 until his transfer on July 14, 2025. He was placed in Alligator Alcatraz on July 14, 2025. He was transferred from Alligator Alcatraz to Krome Detention Center on August 2, 2025.
7. Before G.M.S.G. was detained, he had an immigration case in the New Orleans immigration court. However, that case has been administratively closed since 2015.

8. At the bond hearing I described in Paragraph 6 of my July 29, 2025, declaration, after the Immigration Judge advised me that she lacked jurisdiction and did not know which immigration court would have jurisdiction, I mentioned this administratively closed case in New Orleans. The immigration judge advised me that my best course of action would be to seek to transfer this administratively closed New Orleans case to Krome. As a result, I sent an email to the duty officer for ICE's Office of the Principal Legal Advisor, New Orleans. A true and correct copy of the resulting email chain between me and Carlee Valenti, the Assistant Chief Counsel who responded to my email is attached as **Exhibit A**.

Executed this 11th day of August 2025, at Pensacola, Florida.



Aida Marta Ramirez

Aida Marta Ramirez, Esq.

From: Valenti, Carlee M <Carlee.M.Valenti@ice.dhs.gov>
Sent: Thursday, July 24, 2025 11:30 AM
To: Aida Marta Ramirez, Esq.
Subject: RE: [REDACTED] A# [REDACTED] Request for Assistance – Transfer of Immigration Matter to Proper Jurisdiction

Thank you for the information. Based on what I can see on my end, there is nowhere for me to file a transfer since it shows EOIR jurisdiction with Krome.

Carlee M. Valenti
Assistant Chief Counsel
Office of the Principal Legal Advisor, New Orleans
U.S. Immigration and Customs Enforcement
Main: (504) 599-7938

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From: Aida Marta Ramirez, Esq. <Aida@ramirezhormaza.com>
Sent: Thursday, July 24, 2025 11:27 AM
To: Valenti, Carlee M <Carlee.M.Valenti@ice.dhs.gov>
Subject: RE: [REDACTED] A# [REDACTED] Request for Assistance – Transfer of Immigration Matter to Proper Jurisdiction

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We appeared before Immigration Judge Romey, who advised that the Krome Immigration Court no longer has jurisdiction over individuals detained at that facility. As a result, no action was taken on the bond request for our client. When we inquired further, Judge Romey indicated that she was unsure which immigration court currently has jurisdiction, noting that directives have been shifting frequently. However, she advised that our best course of action would be to seek the case's transfer as soon as possible.

Sincerely,

AIDA M. RAMIREZ
IMMIGRATION ATTORNEY

RAMIREZ HORMAZA LAW GROUP



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From: Valenti, Carlee M <Carlee.M.Valenti@ice.dhs.gov>

Sent: Thursday, July 24, 2025 10:38 AM

To: Aida Marta Ramirez, Esq. <Aida@ramirezhormaza.com>

Subject: RE: [REDACTED] A# [REDACTED] Request for Assistance – Transfer of Immigration Matter to Proper Jurisdiction

Good morning,

Can you tell me what Immigration Judge? Anything I see is that this case is with Krome, and that on 7/21/25 Krome Immigration court granted a request for Webex hearing. Last I see about New Orleans was that a motion to recal was filed on 6/30/25.

Carlee M. Valenti
Assistant Chief Counsel
Office of the Principal Legal Advisor, New Orleans
U.S. Immigration and Customs Enforcement
Main: (504) 599-7938

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From: Aida Marta Ramirez, Esq. <Aida@ramirezormaza.com>

Sent: Thursday, July 24, 2025 10:10 AM

To: OPLA-NOL-Duty, <OPLA-NOL-DUTY@ice.dhs.gov>

Subject: RE: [REDACTED] A# [REDACTED] Request for Assistance – Transfer of Immigration Matter to Proper Jurisdiction

You don't often get email from aida@ramirezormaza.com. [Learn why this is important](#)

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Good morning,

I am writing to request your assistance in the matter of my client, who is currently detained at the Alligator Alcatraz facility.

Although the case is currently administratively closed before the New Orleans Immigration Court, the client is now detained outside that jurisdiction, and the matter should be transferred to the Immigration Court with jurisdiction over the detention facility.

The Immigration Judge has advised that I contact the duty attorney with OPLA to initiate the transfer process. I would appreciate your guidance or confirmation of the appropriate contact to whom I should direct this request, and any specific information you may need from our end to facilitate the transfer.

Please let me know how we may proceed.

Thank you for your time and attention to this matter.

Sincerely,

AIDA M. RAMIREZ
IMMIGRATION ATTORNEY

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